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 Attorneys for Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
 MEMORIAL HOSPITAL, INC. (doing business  
 as “Sage Memorial Hospital”); an Arizona non-  
 profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION  
 REGARDING DEFENDANTS’  
 MOTION TO STAY DISCOVERY**

IT IS HEREBY STIPULATED AND AGREED that the Motion to Stay Discovery  
 (ECF No. 170) filed by Defendants Razaghi Development Company, LLC, Ahmad Razaghi,  
 and Tausif Hasan (collectively, “Defendants”) shall be considered moot given the Court’s  
 recent Order (ECF No. 178) ruling on Defendants’ Motion to Dismiss Second Amended

Complaint (ECF No. 147), without prejudice to Defendant re-submitting said request to stay discovery as appropriate once Plaintiff has submitted an amended complaint. This Court has already granted the parties' prior Stipulation that they shall submit a proposed discovery plan 14-days after Plaintiff files its amended complaint. Based on this information, the parties agree that Plaintiff need not provide a response to Defendants' Motion to Stay Discovery unless or until said motion is re-submitted by Defendants in the future.

The parties have so stipulated.

RESPECTFULLY SUBMITTED this 18th day of April 2022.

/s/ Paul Padda (with permission)

Kathleen Bliss, Esq.  
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Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff, Counterdefendant  
and Third-Party Defendants*

/s/ Kris Leonhardt

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Kris Leonhardt, Esq.  
Nermana Pehlic, Esq.  
Jeffrey D. Winchester, Esq.  
*Counsel for Defendants*

IT IS SO ORDERED that the Joint Stipulation Regarding Defendants' Motion to Stay Discovery (ECF No. 184) is GRANTED.

IT IS FURTHER ORDERED that Defendants' Motion to Stay Discovery (ECF No 170) is DENIED as moot and without prejudice.

  
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U.S. MAGISTRATE JUDGE

Dated: April 19, 2022